

EXHIBIT B



Richard Liebowitz <rl@liebowitzlawfirm.com>

Re: Bradley v. Analytical Grammar, Inc.

1 message

Dan <dan@danboothlaw.com>
To: Richard Liebowitz <RL@liebowitzlawfirm.com>

Mon, Oct 7, 2019 at 3:39 PM

Richard,

Thanks for your call. To summarize, you proposed that we postpone the Rule 26(f) conference we had scheduled for today until noon tomorrow, and in the meantime, we would return to our clients to see if a settlement can be reached, and we will report back to each other with our clients' positions later today or tomorrow morning. If we don't reach a settlement before then, I am available at noon tomorrow to work through the joint discovery plan.

Regards,

Dan Booth
Dan Booth Law LLC
60 Thoreau Street #121
Concord, MA 01742
646-573-6596
dan@danboothlaw.com

On Oct 7, 2019, at 2:51 PM, Richard Liebowitz <RL@liebowitzlawfirm.com> wrote:

Headed into Court. Will call you as soon as I am out. Thank you.

On Mon, Oct 7, 2019 at 11:37 AM Dan <dan@danboothlaw.com> wrote:

I'm available at 3pm today. Again, please inform what court rescheduled your conference last-minute this morning, and provide the rescheduling order.

Dan Booth
Dan Booth Law LLC
60 Thoreau Street #121
Concord, MA 01742
646-573-6596
dan@danboothlaw.com

On Oct 7, 2019, at 11:20 AM, Richard Liebowitz <RL@liebowitzlawfirm.com> wrote:

How does earlier at 1:30pm work?

On Mon, Oct 7, 2019 at 8:55 AM Dan <dan@danboothlaw.com> wrote:

Richard,

This is short notice and I have evening plans already set. When did the court reschedule your conference, and in what case? Please provide a copy of the rescheduling order.

Regards,

Dan Booth
Dan Booth Law LLC
60 Thoreau Street #121
Concord, MA 01742
646-573-6596

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dan@danboothlaw.com

On Oct 7, 2019, at 4:39 AM, Richard Liebowitz
<RL@liebowitzlawfirm.com> wrote:

Hi Dan,

Can we push our phone call to 6pm on Monday? I have a Court conference that got moved to 3pm. Thank you.

Best,

Richard Liebowitz, Esq.
Liebowitz Law Firm, PLLC
t.516-233-1660
RL@LiebowitzLawFirm.com
www.LiebowitzLawFirm.com

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On Wed, Sep 18, 2019 at 5:24 PM Dan <dan@danboothlaw.com> wrote:
Confirmed, 3pm EST on October 7. Talk with you then.

Regards,

Dan Booth
Dan Booth Law LLC
60 Thoreau Street #121
Concord, MA 01742
646-573-6596
dan@danboothlaw.com

On Sep 18, 2019, at 4:22 PM, Richard Liebowitz
<RL@liebowitzlawfirm.com> wrote:

October 7th at 3pm works.

Best,

Richard Liebowitz, Esq.
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On Wed, Sep 18, 2019 at 4:15 PM Dan
<dan@danboothlaw.com> wrote:

Richard,

Our client expects to prevail and does not accept your offer.

I asked you twice yesterday for your availability for a Rule 26(f) conference on October 7 or 8. Please advise.

Regards,

Dan Booth
Dan Booth Law LLC
[60 Thoreau Street #121](#)
[Concord, MA 01742](#)
646-573-6596
dan@danboothlaw.com

On Sep 17, 2019, at 3:54 PM, Richard
Liebowitz <RL@liebowitzlawfirm.com>
wrote:

Counsel,

I am authorized to make a final offer of \$5,500 to resolve this matter at this very early stage of the litigation. This offer is on the table until Thursday, Sept 19th at 5pm EST at which point it will be revoked. Thank you.

On Tue, Sep 17, 2019 at 1:34 PM Richard
Liebowitz <RL@liebowitzlawfirm.com>
wrote:

Thank you, Chris.

On Tue, Sep 17, 2019 at 1:33 PM
Thomas, Christopher M.
<christhomas@parkerpoe.com> wrote:

Hi Richard,

Thanks for reaching out. We are not available tomorrow and will need to

coordinate with lead counsel in order to determine when we can do the conference. After we do that, we'll send a list of dates and times.

Thanks,
Chris

From: Richard Liebowitz
<RL@liebowitzlawfirm.com>
Sent: Tuesday, September 17, 2019
12:38 PM
To: Thomas, Christopher M.
<christthomas@parkerpoe.com>;
Lawson, Catherine R. L.
<catherinelawson@parkerpoe.com>
Subject: Bradley v. Analytical
Grammar, Inc.

Caution: External email

Hi Chris and Catherine,

Are you available to have our Rule26F conference tomorrow (Wednesday) at 2:30pm?

Thank you.

Best,

Richard Liebowitz, Esq.

Liebowitz Law Firm, PLLC

t.516-233-1660

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Christopher Thomas
Partner



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Best,

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